

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROGER J. GOSSELIN, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

FIRST TRUST ADVISORS L.P., *et al.*,

Defendants.

Consolidated Action No. 08-CV-05213

Honorable Samuel Der-Yeghiayan

**JOINT MOTION TO EXTEND DEADLINES TWENTY-ONE DAYS TO FACILITATE
SETTLEMENT DISCUSSIONS**

The parties hereby ask this Court for a twenty-one day extension of time to facilitate settlement discussions, stating as follows:

1. This action is a private securities class action that falls under the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4 (the “PSLRA”);

2. On January 15, 2009, the Court issued its order appointing the First Trust Investor Group as Lead Plaintiff, Brower Piven as Lead Counsel, and Krislov & Associates, Ltd. as Liaison Counsel (Dkt. No. 77);

3. On December 17, 2009, the Court denied Defendants’ motion to dismiss the Consolidated Complaint (Dkt. No. 122);

4. After its January 14, 2010 status conference, the Court issued orders dated January 6, 2010 (Dkt. No. 123) and January 14, 2010 (Dkt. No. 124) (collectively, the “Order”) setting deadlines in this action as follows: service of Defendants’ answer(s) to the Consolidated Class Action Complaint (2/15/2010); naming additional parties (8/16/2010), completing fact

discovery (9/15/2010), service of Plaintiffs' expert disclosures and reports (10/15/2010), service Defendants' expert disclosures and reports (11/15/2010); service of Plaintiffs' expert rebuttal reports (12/15/2010); filing dispositive motions (2/25/2011), filing responses to dispositive motions (3/25/2011), and filing replies to dispositive motions (4/25/2011).

5. The parties desire to explore the possibility of settlement of this litigation and agree that it would be in the interest of all parties, the prospective class and judicial economy to continue the current deadlines established by the Order for twenty-one (21) days to allow the parties to pursue settlement discussions before Defendants are required to answer the Consolidated Class Action Complaint and before the commencement of the discovery process and the incurring of the time and expense connected therewith.

Accordingly, based on the foregoing, the parties respectfully request that the Court extend each of the deadlines established by the Order by twenty-one (21) days, as follows:

1. to answer the Consolidated Class Action - March 8, 2010;
2. to name additional parties - September 6, 2010;
3. to complete fact discovery - October 6, 2010;
4. for Plaintiffs to serve expert disclosures and reports - November 5, 2010;
5. for Defendants to serve expert disclosures and reports - December 6, 2010;
6. for Plaintiffs to serve expert rebuttal reports - January 5, 2011;
7. to file dispositive motions - March 18, 2011;
8. to file responses to dispositive motions - April 15, 2011; and
9. to file replies to dispositive motions - May 16, 2011.

Dated: February 3, 2010

Respectfully submitted,

KRISLOV & ASSOCIATES, LTD.

BRYAN CAVE LLP

/s/ Jeffrey M. Salas
Clinton A. Krislov
Jeffrey M. Salas
20 North Wacker Drive
Suite 1350
Chicago, Illinois 60606
Telephone: (312) 606-0500
Facsimile: (312) 606-0207

/s/ Steven R. Smith
Steven R. Smith
Derek S. Holland
161 North Clark Street
Suite 4300
Chicago, IL 60601-3206
Tel: (312) 602-5000
Fax: (312) 602-5050

*Liaison Counsel
for Lead Plaintiff and the Classes*

**MILBANK, TWEED, HADLEY &
McCLOY LLP**

Sean M. Murphy (*pro hac vice*)
1 Chase Manhattan Plaza
New York, NY 10005-1413
Tel: (212) 530-5000
Fax: (212) 530-5219

BROWER PIVEN

A Professional Corporation
David A.P. Brower
488 Madison Avenue
Eighth Floor
New York, New York 10022
Telephone: (212) 501-9000
Facsimile: (212) 501-0300

*Attorneys for Defendants First Trust
Advisors L.P., First Trust Portfolios L.P.,
First Trust Strategic High Income Fund,
First Trust Strategic High Income Fund II,
First Trust Strategic High Income Fund III,
James A. Bowen and Mark R. Bradley*

BROWER PIVEN

A Professional Corporation
Charles J. Piven
Yelena Trepetin
1925 Old Valley Road
Stevenson, Maryland 21153

Lead Counsel for Lead Plaintiff and the Classes